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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

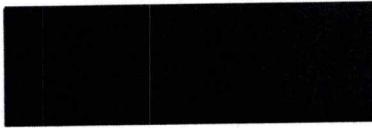
AT BALTIMORE
CLERK, U.S. DISTRICT COURT
DISTRICT OF MARYLAND

BY

DEPUTY

UNITED STATES OF AMERICA

v.

MARLOW BATES
a/k/a "Low,"
a/k/a "Low Low,"


Defendants.

UNDER SEAL

Criminal No. DKC 24cr 198

(Conspiracy to Distribute and
Possess with Intent to Distribute
Controlled Substances, 21 U.S.C.
§ 846; Possession with Intent to
Distribute Controlled Substances, 21
U.S.C. § 841(a); Aiding and
Abetting, 18 U.S.C. § 2; Forfeiture,
21 U.S.C. § 853)

INDICTMENT

COUNT ONE

(Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances)

The Grand Jury for the District of Maryland charges:

From a date unknown to the Grand Jury but no later than August 2023 and continuing until
on or about February 2024, in the District of Maryland, the defendants,

MARLOW BATES
a/k/a "Low,"
a/k/a "Low Low,"


did knowingly combine, conspire, confederate, and agree with persons known and unknown to the
Grand Jury to distribute and possess with the intent to distribute a mixture or substance containing

a detectable amount of amount of cocaine, a Schedule II controlled substance.

21 U.S.C. § 846 and 21 U.S.C. § 841(b)(1)(C)

COUNT TWO
(Distribution and Possession with Intent to Distribute Controlled Substances)

The Grand Jury for the District of Maryland further charges:

On or about December 7, 2023, in the District of Maryland, the defendant,



did knowingly and intentionally possess with intent to distribute a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

21 U.S.C. § 841(a)(1) and § 841(b)(1)(C)

18 U.S.C. § 2

COUNT THREE
(Distribution and Possession with Intent to Distribute Controlled Substances)

The Grand Jury for the District of Maryland further charges:

On or about December 19, 2023, in the District of Maryland, the defendant,

[REDACTED]

did knowingly and intentionally possess with intent to distribute a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

21 U.S.C. § 841(a)(1) and § 841(b)(1)(C)

COUNT FOUR

(Distribution and Possession with Intent to Distribute Controlled Substances)

The Grand Jury for the District of Maryland further charges:

On or about January 4, 2024, in the District of Maryland, the defendant,

[REDACTED]

did knowingly and intentionally possess with intent to distribute a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

21 U.S.C. § 841(a)(1) and § 841(b)(1)(C)

COUNT FIVE
(Possession with Intent to Distribute Controlled Substances)

The Grand Jury for the District of Maryland further charges:

On or about February 25, 2024, in the District of Maryland, the defendant,

MARLOW BATES
a/k/a "Low,"
a/k/a "Low Low,"

did knowingly and intentionally possess with intent to distribute a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

21 U.S.C. § 841(a)(1) and § 841(b)(1)(C)

FORFEITURE ALLEGATION

The Grand Jury for the District of Maryland further finds that:

1. Pursuant to Rule 32.2, Fed. R. Crim. P., notice is hereby given to the defendants that the United States will seek forfeiture as part of any sentence in accordance with 21 U.S.C. § 853, in the event of the defendants' convictions under Counts One through Five of this Indictment.

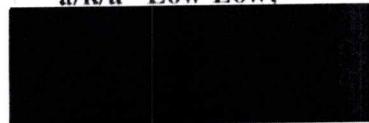
Narcotics Forfeiture

2. Upon conviction of the offense(s) set forth in Counts One through Five the defendants,

MARLOW BATES

a/k/a "Low,"

a/k/a "Low Low,"



shall forfeit to the United States, pursuant to 21 U.S.C. § 853(a):

- a. any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offense(s); and
- b. any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offense(s).

Property Subject to Forfeiture

3. The property to be forfeited includes, but is not limited to, the following:
 - a. a forfeiture money judgment in the amount of proceeds each defendant obtained as a result of any of the offenses alleged in Counts One through Four;

- b. approximately \$7,131.00 in U.S. currency seized from Marlow Bates' person and from 2809 Boston Street, Apartment 305, Baltimore, Maryland 21224 on or about February 25, 2024;
- c. a necklace with a pendant reading "Low-Low" seized from 2809 Boston Street, Apartment 305, Baltimore, Maryland 21224 on or about February 25, 2024;
- d. a Rolex watch seized from 2809 Boston Street, Apartment 305, Baltimore, Maryland 21224 on or about February 25, 2024;
- e. a necklace with a pendant reading "BG 1500" seized from 2809 Boston Street, Apartment 305, Baltimore, Maryland 21224 on or about February 25, 2024;
- f. a Taurus G2C 9mm handgun bearing serial number ABE629875; and
- g. a Sig Sauer P290RS 9mm handgun bearing serial number 26C069133; and
- h. approximately 51 rounds of 9mm ammunition.

Substitute Assets

4. If, as a result of any act or omission of any defendant, any of the property described above as being subject to forfeiture:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States shall be entitled to forfeiture of substitute property up to the value of the forfeitable property described above pursuant to 21 U.S.C. § 853(p).

21 U.S.C. § 853



Erek L. Barron
United States Attorney

A TRUE BILL:

[REDACTED]
Foreperson

6/18/24
Date